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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,)
)
12 Plaintiff,)
)
13 v.) 2:09-CR-078-JCM (RJJ)
)
14 SAMUEL DAVIS and)
SHAWN RICE,)
15)
)
16 Defendants.)

17 **BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

18 The United States of America, by and through Gregory A. Brower, United States Attorney
19 for the District of Nevada, Eric Johnson, Assistant United States Attorney, and Daniel Hollingsworth,
20 Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of
21 Property.

22 The allegations of Counts One through Thirty-One of the Indictment are hereby realleged and
23 incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of
24 Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c).

25 Upon a conviction of the felony offense charged in Counts One through Thirty-One of this
26 Indictment, defendants

**SAMUEL DAVIS, and
SHAWN RICE,**

defendants herein, shall forfeit to the United States of America, any property involved in transactions or attempted transactions in violations of Title 18, United States Code, Section 1956 up to \$1,290,000.00 In United States Currency, including but not limited to:

- a) \$129,647.17 in United States Currency seized from WELLS FARGO BANK ACCOUNT 6783965202 IN THE NAME OF BOULDER MOUNTAIN FUNDING TRUST, 530 LAS VEGAS BOULEVARD SOUTH, LAS VEGAS, NEVADA 89101;
- b) \$1,373.35 in United States Currency seized from WELLS FARGO BANK ACCOUNT 250-2159375 IN THE NAME OF SPECIALTY MANAGEMENT, INC., 530 LAS VEGAS BOULEVARD SOUTH, LAS VEGAS, NEVADA 89101; and
- c) \$1,224.15 in United States Currency seized from J.P. MORGAN CHASE BANK, ACCOUNT 634094312 IN THE NAME OF SIMPE, LTA, 31 BUTTERFIELD ROAD, CHINO VALLEY, AZ 86323.

If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been place beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

...

1 it is the intent of the United States of America to seek forfeiture of any properties of the defendant up
2 to \$1,290,000.00 in United States Currency.

3 All pursuant to Title 18, United States Code, Section 981(a)(1)(A); Title 28, United States
4 Code, Section 2461(c); Title 18, United States Code, Section 1956; and Title 21, United States Code,
5 Section 853(p).

6 The allegations of Counts One through Thirty-One of this Indictment are hereby realleged
7 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision
8 of Title 18, United States Code, Section 982(a)(1).

9 Upon a conviction of the felony offense charged in Counts One through Thirty-One of this
10 Indictment, defendants

11 **SAMUEL DAVIS, and**
12 **SHAWN RICE,**
13 defendants herein, shall forfeit to the United States of America, any property involved in or
14 traceable to violations of Title 18, United States Code, Section 1956 up to \$1,290,000.00 In
United States Currency, including but not limited to:

- 15 a) \$129,647.17 in United States Currency seized from WELLS
16 FARGO BANK ACCOUNT 6783965202 IN THE NAME OF
17 BOULDER MOUNTAIN FUNDING TRUST, 530 LAS VEGAS
18 BOULEVARD SOUTH, LAS VEGAS, NEVADA 89101;
- 19 b) \$1,373.35 in United States Currency seized from WELLS FARGO
20 BANK ACCOUNT 250-2159375 IN THE NAME OF SPECIALTY
21 MANAGEMENT, INC., 530 LAS VEGAS BOULEVARD
22 SOUTH, LAS VEGAS, NEVADA 89101; and
- 23 c) \$1,224.15 in United States Currency seized from J.P. MORGAN
24 CHASE BANK, ACCOUNT 634094312 IN THE NAME OF
25 SIMPE, LTA, 31 BUTTERFIELD ROAD, CHINO VALLEY, AZ
26 86323.

1 If any property being subject to forfeiture pursuant to Title 18, United States Code,
2 Section 982(a)(1), as a result of any act or omission of the defendants –

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been place beyond the jurisdiction of the court;
6 d. has been substantially diminished in value; or
7 e. has been commingled with other property that cannot be divided without
8 difficulty;

9 it is the intent of the United States of America to seek forfeiture of any properties of the defendant
10 up to \$1,290,000.00 in United States Currency.

11 All pursuant to Title 18, United States Code, Section 1956 and Title 18, United States
12 Code, Section 982(b)(2).

13 Dated this 17th day of July, 2009.

14 Respectfully submitted,

15 GREGORY A. BROWER
16 United States Attorney

17 /s/DanielDHollingsworth
18 DANIEL D. HOLLINGSWORTH
19 Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, Maliece Troth, certify that the following individuals were served with copies of the Bill of Particulars for Forfeiture of Property on July 17, 2009 by the below identified method of service:

E-mail/ECF

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/s/MalieceTroth
MALIECE TROTH
Forfeiture Support Associate Paralegal